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May 5, 2022

Hon. Brian R. Martinotti, U.S.D.J.  
United States District Court of New Jersey  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: Williams v. Radius Global Solutions LLC  
Case No. 2:21-cv-10954(BRM)(JBC)

Dear Judge Martinotti:

I represent the Plaintiff in the above-referenced matter. I write in response to this Court's April 19, 2022 Order requesting supplemental briefing regarding Article III standing in light of the U.S. Supreme Court's recent decision in *Transunion, LLC v. Ramirez*, 141S.Ct. 2190 (2021). (Dkt. 19).

Based upon the recent Ramirez decision and subsequent case law, Plaintiff does not oppose dismissal of the present case based solely upon a lack of Article III standing. Dismissal of the case should be made without prejudice since the District Court lacks subject matter jurisdiction as to Plaintiff. See, *Kamal v. J. Crew Grp., Inc.*, 918 F.3d 102, 119 (3d Cir. 2019); *Cottrell v. Alcon Labs.*, 874 F.3d 154, 164 n.7 (3d Cir. 2017) (stating that "[b]ecause the absence of standing leaves the court without subject matter jurisdiction to reach a decision on the merits, dismissals 'with prejudice' for lack of standing are generally improper").

Plaintiff intends to refile the present action in New Jersey state court. Thank you for your consideration.

Very truly yours,

/s/Ryan Gentile  
Ryan Gentile, Esq.